

REMARKS

In the Office Action, the Examiner rejected claims 1-50. In light of the following remarks, Applicants respectfully request reconsideration and allowance of all pending claims.

Rejections under 35 U.S.C. § 102

In the Office Action, the Examiner rejected claims 1-50 under 35 U.S.C. § 102(e) as anticipated by the Reid reference (U.S. Pat. No. 5,982,614). Although the Examiner rejected the instant claims under Section 102(e), the fact that the instant application was filed (March 27, 2001) after the Reid patent issued (November 9, 1999) indicates that the Examiner intended to reject the instant claims under Section 102(b). Regardless, Applicants respectfully assert that the pending claims are not anticipated by the Reid reference.

Anticipation under Section 102 can be found only if a single reference shows exactly what is claimed. *Titanium Metals Corp. v. Banner*, 778 F.2d 775, 227 U.S.P.Q. 773 (Fed. Cir. 1985). For a prior art reference to anticipate under Section 102, every element of the claimed invention must be identically shown in a single reference. *In re Bond*, 910 F.2d 831, 15 U.S.P.Q.2d 1566 (Fed. Cir. 1990). To maintain a proper rejection under Section 102, a single reference must teach each and every element or step of the rejected claim. *Atlas Powder v. E.I. du Pont*, 750 F.2d 1569 (Fed. Cir. 1984). Thus, if the claims recite even one element not found in the cited reference, the reference does not anticipate the claimed invention. With respect to

the present claims, Applicants respectfully assert that the Reid reference does not disclose *all* of the recited features.

Independent Claim 1 and the Claims Depending Therefrom

For example, independent claim 1 recites, *inter alia*, “a plurality of ports ...[and] a plurality of connectors *disposed adjacent to* the plurality of ports, wherein at least two ports of the plurality of ports *share a common connector* of the plurality of connectors.” There is no reason to believe that the Reid reference discloses these features.

Applicants also remind the Examiner that, during patent examination, the pending claims must be given their broadest reasonable interpretation consistent with the specification. *See In re Prater*, 415 F.2d 1393, 1404-05, 162 U.S.P.Q. 541, 550-51 (C.C.P.A. 1969); *see also In re Morris*, 127 F.3d 1048, 1054-55, 44 U.S.P.Q.2d 1023, 1027-28 (Fed. Cir. 1997); *see also* M.P.E.P. §§ 608.01(o) and 2111. Interpretation of the claims must also be consistent with the interpretation that those of ordinary skill in the art would reach. *See In re Cortright*, 165 F.3d 1353, 1359, 49 U.S.P.Q.2d 1464, 1468 (Fed. Cir. 1999); *see also* M.P.E.P. § 2111. As further explained in Section 2111.01 of the M.P.E.P., the words of the claim must be given their plain meaning unless the applicant has provided a clear definition in the specification. *See In re Zletz*, 893 F.2d 319, 321, 13 U.S.P.Q.2d 1320, 1322 (Fed. Cir. 1989). Again, the plain meaning refers to an interpretation by those of ordinary skill in the art. *See In re Sneed*, 710 F.2d 1544, 218 U.S.P.Q. 385 (Fed. Cir. 1983). In the Office Action, the Examiner appears to be interpreting the instant claim in an unreasonable manner inconsistent with the specification and, also,

inconsistent with an interpretation of one of ordinary skill in the art. In light of the specification, one of ordinary skill in the art would clearly understand ports to be communication ports and, also, connectors to be the mechanical connectors adjacent the communication ports.

Turning to the cited reference, Reid discloses “a means for *sharing peripherals* between a portable computer and a desktop computer.” Reid, column 2, lines 39-41; *see also* Fig. 1. (Emphasis added). In fact, Reid is absolutely silent regarding connectors disposed adjacent ports, much less any sort of sharing of such connectors. Instead, the Reid reference couples a port 122 of a notebook 120 and ports 112 of a desktop computer 110 via docking means 200, which provides one of the computers 110 and 120 selective access to peripheral devices 130. *See* Reid, column 4, lines 33-42. Reid further discloses that this selective access functionality of the docking means 200 “*must* have internal circuitry 400.” Reid, column 7, lines 56-57. The docking means 200 also employs a manual switch 240 to control the internal circuitry 400. *See* Reid, column 7, lines 65-67. However, ports 112, 210, and 203 of Reid do not in any way *share a common connector*, as recited in the instant claims. At most, the Reid reference teaches the traditional configuration of ports and connectors in which each port has its own set of exclusive connectors (not shared). Accordingly, the cited reference cannot anticipate the instant claim in view of these omitted features.

For these reasons, Applicants respectfully assert that independent claim 1 and its respective dependent claims 2-16 are patentable over the Reid reference. Accordingly, Applicants request the Examiner withdraw the rejections of claims 1-16 under 35 U.S.C. § 102.

Independent Claim 17 and the Claims Depending Therefrom

Independent claim 17 recites, *inter alia*, “a plurality of ports disposed *on the communication panel*...[and] a plurality of connectors disposed *on the communication panel* adjacent the plurality of ports, wherein the at least two ports *share a common* connector of the plurality of connectors.” (Emphasis added).

As discussed above, the Reid focuses on the *sharing of peripherals*, rather than the *sharing of a common connector*. Again, the ports 112, 210, and 203 of Reid do not *share* a common connector, as recited in the instant claims. Rather, the Reid reference teaches the traditional configuration of ports and connectors in which each port has its own set of exclusive connectors (not shared). Accordingly, the Reid reference does not disclose the *common connector* located on the communication panel, as recited in the instant claim.

In view of the foregoing omitted features, Applicants respectfully assert that independent claim 17 and its respective dependent claims 18-27 are patentable over the Reid reference. Accordingly, Applicants request the Examiner withdraw the rejections of claims 17-27 under 35 U.S.C. § 102.

Independent Claim 28 and the Claims Depending Therefrom

Independent claim 28 recites, *inter alia*, first and second communication ports externally disposed on a portable computing device. Claim 28 further recites, “a *common connector disposed on the portable computing device between* the first and second communication ports.” (Emphasis

added). As discussed above, there is no reason to believe that the Reid device employs anything other than the traditional *non-shared* connector design. Thus, the Reid reference does not disclose the *common* connector *disposed on* the portable computing device, as recited in the instant claim. In view of the foregoing omitted features, Applicants respectfully assert that independent claim 28 and its respective dependent claims 29-33 are patentable over the Reid reference. Accordingly, Applicants request the Examiner withdraw the rejections of claims 28-33 under 35 U.S.C. § 102.

Independent Claim 34 and the Claims Depending Therefrom

Independent claim 34 recites “locating a plurality of connectors *on the first electronic device*...[and] deploying a single connector of the plurality of connectors between the plurality of communication ports for *sharing* among the communication ports.” (Emphasis added). As discussed above, the Reid reference discloses traditional *non-shared* connectors. Accordingly, the Reid reference does not disclose the *common* connector located on the first electronic device, as recited in the instant claim. In view of the foregoing omitted features, Applicants respectfully assert that independent claim 34 and its respective dependent claims 35-42 are patentable over the Reid reference. Accordingly, Applicants request the Examiner withdraw the rejections of claims 34-42 under 35 U.S.C. § 102.

Independent Claim 43 and the Claims Depending Therefrom

Independent claim 43 recites “disposing first and second ports *on* the portable computing device, wherein the first and second ports *have connector members* for coupling with an input/output cable...[and] *sharing* one of the connector members between the first and second

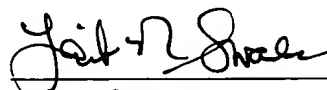
ports.” (Emphasis added). As stated above, the Reid reference discloses traditional *non-shared* connectors on each of the notebook 120, the desktop computer 110, and the docking means 200. Accordingly, the cited reference does not disclose sharing of connectors adjacent ports, as recited in the instant claim. In view of the foregoing omitted features, Applicants respectfully assert that independent claim 43 and its respective dependent claims 44-50 are patentable over the Reid reference. Accordingly, Applicants request the Examiner withdraw the rejections of claims 43-50 under 35 U.S.C. § 102.

Conclusion

In view of the remarks and amendments set forth above, Applicants respectfully request allowance of the pending claims. If the Examiner believes that a telephonic interview will help speed this application toward issuance, the Examiner is invited to contact the undersigned at the telephone number listed below.

Respectfully submitted,

Date: October 20, 2003



Tait R. Swanson
Reg. No. 48,226
(281) 970-4545

Correspondence Address:

Hewlett-Packard Company
IP Administration
P.O. Box 272400
Fort Collins, CO 80527-2400